



FEDERAL ELECTION COMMISSION
Washington, DC 20463

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COMMISSION

2015 JUL 28 AM 11: 58

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MEMORANDUM

TO: The Commission

FROM: Daniel A. Petalas
Associate General Counsel for Enforcement

BY: Mark Shonkwiler *MS*
Assistant General Counsel
Kimberly D. Hart *KDH*
Attorney

SUBJECT: MUR 6922 (Michael Henke)
Pre-Probable Cause Conciliation Agreement

On March 3, 2015, the Commission made reason to believe findings and voted to enter into a pre-probable cause conciliation agreement with Michael Henke, relating to \$23,419 in prohibited corporate contributions that ACA International ("ACA") made at Henke's direction to ACPAC ACA International Political Action Committee ("ACPAC") in the names of others and the resulting inaccurate disclosure reports that ACPAC filed with the Commission.

Attached is the negotiated conciliation agreement, executed on July 23, 2015, which would settle Henke's violations.

We recommend that the Commission accept the signed agreement.

MUR 6922 (Henke)
Memorandum to the Commission
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11 We therefore recommend that the Commission accept the
12 attached conciliation agreement and close the file in this matter.
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14 **II. RECOMMENDATIONS:**

- 15
16 1. Accept the attached conciliation agreement with Michael Henke.
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18 2. Approve the appropriate letter.
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20 3. Close the file.
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